

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In re: LTL MANAGEMENT LLC,¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**NOTICE OF MOTION OF THE OFFICIAL COMMITTEE OF TALC CLAIMANTS TO
(A) COMPEL DEPOSITION TESTIMONY OF ADAM PULASKI, (B) AUTHORIZE
SUBSTITUTED SERVICE OF A SUBPOENA ON MR. PULASKI, AND (C) GRANT
OTHER RELATED RELIEF**

PLEASE TAKE NOTICE that the Official Committee of Talc Claimants (the “TCC”) of LTL Management LLC, (“LTL” or the “Debtor”), by and through the TCC’s proposed counsel, shall move, on an expedited basis, before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, pursuant to Rule 26(b) of the Federal Rules of Civil Procedure (as made applicable to these proceedings by Rules 7026 and 9014(c) of the Federal Rules of Bankruptcy Procedure), seeking entry of an order, substantially in the form submitted with this motion, (a) directing Adam Pulaski to sit and be deposed on or before June 14, 2023 and provide testimony under oath regarding the matters raised in the application in support of this motion and related matters, (b) authorizing substituted service of a subpoena on Mr. Pulaski, and (c) granting such other relief that is just and proper (the “Motion”).

PLEASE TAKE FURTHER NOTICE that, substantially contemporaneously with the filing of this Motion, the TCC has filed an Application for Order Shortening Time and Certain Other Relief (the “Scheduling Application”) requesting that the hearing on the Motion be scheduled for June 6, 2023. **TAKE NOTE that the order entered with respect to the Scheduling Application will, among other things, specify the date and time of the hearing on the Motion.**

PLEASE TAKE FURTHER NOTICE that, the TCC shall rely upon the application filed herewith in support of the relief sought by this Motion, and that no brief is being filed herewith since the legal basis upon which relief should be granted is set forth in the supporting application

filed with the Motion.

PLEASE TAKE FURTHER NOTICE that, oral argument is requested, unless the Court directs that no oral argument would be necessary.

PLEASE TAKE FURTHER NOTICE, that all objections, if any, must be made accordance with the Court's order entered with respect to the Scheduling Application. If the order entered with respect to the Scheduling Application directs that written objections be filed, then in accordance with D.N.J. LBR 9013-2(a)(2), written objections shall be filed with the Clerk of the United States Bankruptcy Court, for the District of New Jersey, Courthouse, 402 East State Street, Trenton, New Jersey 08608, and a copy thereof must simultaneously be served upon GENOVA BURNS, LLC., Attn: Daniel M. Stolz, Esq., 110 Allen Road, Suite 304, Basking Ridge, New Jersey 07920, so they are received by the deadline set forth in the Court's order entered with respect to the Scheduling Application.

PLEASE TAKE FURTHER NOTICE that in the absence of any objections, the relief requested hereunder may be granted without further notice.

Dated: June 2, 2023

GENOVA BURNS LLC

By: /s/ Daniel M. Stolz
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